

**UNITED STATES DISTRICT COURT FOR  
THE SOUTHERN DISTRICT OF NEW YORK**

WEIGUO SUN, LINDA HE CHEUNG, JIA LI  
WANG, JIAMEI LU, JUN LIU, MAO-FU  
WENG, RUQIN WANG, TELI CHEN,  
WEIXIANG GE, SHUANG WANG, XINGYU  
YAN, YAN GAO, YI LI, AND YING LIU,

Plaintiffs,

v.

GTV MEDIA GROUP INC., SARACA MEDIA  
GROUP INC., WENGUI GUO (a/k/a HO WAN  
KWOK), VOICE OF GUO MEDIA, INC., AND  
LIHONG WEI LAFRENZ (a/k/a “SARA”, a/k/a  
LIHONG WEI)

Defendants.

Civil Action No.: 1:21-cv-04529

**MOTION TO DISMISS PURSUANT TO F.R.C.P. 41(a)(2)**

Pursuant to Rule 41(a)(2) of the Federal Rules of Civil Procedure, Plaintiffs Weiguo Sun, Linda He Cheung, Jia Li Wang, Jiamei Lu, Jun Liu, Mao-Fu Weng, RuQin Wang, Teli Chen, Weixiang Ge, Shuang Wang, Xingyu Yan, Yan Gao, Yi Li, and Ying Liu (collectively, “Plaintiffs”), by and through their undersigned counsel, hereby move to dismiss this action without prejudice.

This action has been voluntarily stayed at the request of the appearing parties since October 8, 2021 due to a settlement reached between the United States Securities and Exchange Commission (“SEC”) and appearing Defendants GTV Media Group, Inc. (“GTV”), Saraca Media Group, Inc. (“Saraca”), and default-defendant Voice of Guo Media, Inc. (“VOG”). *See* ECF No. 69. The voluntary stay afforded Plaintiffs time to seek to recover alleged damages from an SEC administered Fair Fund. Plaintiffs have done so and seek dismissal of this action. Because they were unable to recover 100% of their damages, Plaintiffs seek dismissal without

prejudice. For these reasons, and as set forth more fully in the accompanying Memorandum of Law, Plaintiffs respectfully request dismissal of this action without prejudice.

Prior to bringing this motion, Plaintiffs' undersigned counsel conferred with counsel for the appearing Defendants GTV, Saraca, and Mr. Wengui Guo. None of the appearing Defendants oppose this motion.

Dated: New York, New York  
December 21, 2023

THOMPSON HINE LLP

By: /s/Brian P. Lanciault, Jr.

Brian P. Lanciault, Jr.  
300 Madison Avenue, 27th Floor  
New York, New York 10017  
T: 212.344.5680  
F: 212.344.6101  
Brian.Lanciault@thompsonhine.com

*Attorneys for Plaintiffs*

If all appearing Defendants agree to dismissing the action, Plaintiffs should re-submit this filing as a voluntary dismissal with Defendants' signatures, and the action may be dismissed without a court order. *See* Fed. R. Civ. P. 41(a)(1)(A)(ii).  
SO ORDERED.



Arun Subramanian, U.S.D.J.  
Date: December 22, 2023